

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ALTAGRACIA J. PEGUERO,

Plaintiff,

v.

AMERICAN EXPRESS COMPANY, THE  
SKLOVER GROUP, INC., and FEDERAL  
INSURANCE COMPANY,

Defendants.

AMERICAN EXPRESS COMPANY,

Third-Party Plaintiff

v.

HEALTHEXTRAS, L.L.C.,

Third-Party Defendant.

Civil Action No. 05-10995-RCL

**ASSENTED-TO MOTION FOR ADMISSION *PRO HAC VICE*  
OF LOUIS SMITH AS CO-COUNSEL FOR THE  
DEFENDANT AND THIRD-PARTY PLAINTIFF  
AMERICAN EXPRESS COMPANY, INC.**

John F. Farraher, Jr., a member of this Court and a member of the firm of Greenberg Traurig, LLP, respectfully moves for the admission to the Bar of this Court, *pro hac vice*, of Louis Smith as co-counsel for the Defendant and Third Party-Plaintiff, American Express Company, Inc. In support of this Motion, attached as Exhibit A is a Certificate For Admission *Pro Hac Vice* of Louis Smith certifying that (1) he is a member of the Bar in good standing in every jurisdiction where he has been admitted to practice; (2) there are no disciplinary proceedings pending against him as a member of

the Bar of any jurisdiction; and (3) he is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, it is respectfully requested that Louis Smith be admitted to the Bar of this Court, *pro hac vice*, to appear as co-counsel for the Defendant and Third-Party Plaintiff, American Express Company, Inc.

Respectfully submitted,

AMERICAN EXPRESS COMPANY, INC.

By its attorneys,

/s/John F. Farraher, Jr.

John F. Farraher, Jr. (BBO #568194)  
GREENBERG TRAURIG, LLP  
One International Place, 20<sup>th</sup> Floor  
Boston, MA 02110  
(617) 310-6000

**RULE 7.1(A)(2) CERTIFICATE**

I, John F. Farraher, Jr., hereby certify that I have conferred with counsel in this matter and they have ASSENTED to the allowance of this motion.

/s/ John F. Farraher, Jr.

John F. Farraher, Jr.

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non registered participants on June 7, 2006.

/s/ John F. Farraher, Jr.

John F. Farraher, Jr.

**EXHIBIT A**

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AMERICAN EXPRESS COMPANY,

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v.

HEALTHEXTRAS, L.L.C.,

Third-Party Defendant.

**CERTIFICATE FOR ADMISSION  
PRO HAC VICE OF LOUIS SMITH**

I, Louis Smith, hereby depose on oath and say:

1. I am a member of the bars of the State of New Jersey, State of New York and various Federal Courts, including the United States Supreme Court, the United States Court of Appeals for the Second, Third, Fourth, Fifth and Seventh Circuits and the United States District Court for the District of New Jersey, the Eastern District of New York, the Southern District of New York, and the Northern District of Illinois.

2. I am a member of the Bar in good standing in every jurisdiction where I have been admitted to practice.

3. There are no disciplinary proceedings pending against me as a member of the Bar of any jurisdiction.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

**SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 7<sup>th</sup>  
DAY OF JUNE, 2006.**

/s/ Louis Smith  
Louis Smith, Bar #  
Greenberg Traurig, LLP  
200 Campus Drive  
P.O. Box 677  
Florham Park, NJ 07932  
Telephone: (973)360-7900  
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